FINDING OF NO SIGNIFICANT IMPACT
FOR THE CITY OF SHELBY, MONTANA
WATER SYSTEM IMPROVEMENTS

TO: ALL INTERESTED PERSONS

Date:	January 16, 2008
Action:	Funding Drinking Water System Improvements
Location of Project:	City of Shelby, Montana
DEQ Loan:	$650,000
TSEP Grant:	$750,000
DNRC Grant:	$100,000
Total Project Cost:	$1,500,000

An environmental assessment (EA) has been prepared by the Montana Department of Environmental Quality (DEQ) for proposed funding for improvements to the City of Shelby water distribution and source water systems. The proposed improvements include the installation of soil/bentonite seals around City Wells No. 7 and 8 and the installation of approximately 11,000 feet of new PVC water main, 2 new fire hydrants, service connection, one meter vault, and all associated controls, and appurtenances. This work will also require the removal and replacement of approximately 9,300 square feet of pavement. The distribution improvements will occur primarily in the south central part of the city from 12th Avenue east to Front Street and from 4th Street South north to Blain Street. The wellhead protection work will occur at the city's well field along the Marias River. The purpose of the project is to make improvements to the community's water supply system needed to protect public health.

The affected environment will primarily be the City of Shelby, Montana, and the immediate vicinity. The human environment affected will include residents and visitors of the aforementioned areas. Based on the EA, the project is not expected to have any significant adverse impacts upon terrestrial and aquatic life or habitat, including endangered species, water quality or quantity, air quality, geological features, cultural or historical features, or social quality.

This project will be funded in part with a low interest loan through the Montana Drinking Water State Revolving Fund Program, administered by the Montana Department of Environmental Quality and the Montana Department of Natural Resources and Conservation. The loan will be repaid by a General Obligation Bond tax assessment.

The DEQ utilized the following references in completing its EA for this project: a Uniform Environmental Checklist for Montana Public Facility Projects and a City of Shelby Water Preliminary Engineering Report (dated April 2006) both prepared by TD&H Engineering, the city's consulting engineer. In addition to these references, letters were sent to; Montana Department of Environmental Quality (MDEQ), Montana Department of Fish, Wildlife & Parks (FWP), Montana Department of Natural Resources & Conservation (DNRC), United States Fish and Wildlife Service (USFWS), United

States Army Corps of Engineers (USACE), and Montana State Historic Preservation Office (SHPO). Response letters have been received from the USACE, USFWS, SHPO, MDEQ and DNRC. These references are available for review upon request by contacting:

Robert Ashton
Montana DEQ
State Revolving Fund Program
P.O. Box 200901
Helena, MT 59620-0901
Phone (406) 444-5316
Email: rashton@mt.gov

or

Mayor Larry Bonderud
City of Shelby
112 1st Street South
Shelby, MT 59474
(406) 434-5222

Comments on this finding or on the EA may be submitted to DEQ at the above address. After evaluating substantive comments, DEQ may revise the EA or determine if an EIS is necessary. This finding will stand if no substantive comments are received during the 30-day comment period or if substantive comments are received and evaluated and the environmental impacts are still determined to be non-significant.

Signed,

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Todd Teegarden, Chief
Technical & Financial Assistance Bureau

CITY OF SHELBY
WATER SYSTEM IMPROVEMENTS

ENVIRONMENTAL ASSESSMENT

I. COVER SHEET

A. PROJECT IDENTIFICATION

Applicant:	City of Shelby
Address:	P.O. Box 743
	Shelby, MT 59474
Project Number:	

B. CONTACT PERSON

Name:	Larry Bonderud, Mayor
	City of Shelby
Address:	P.O. Box 743
	Shelby, MT 59474
Telephone:	(406) 434-5222

C. ABSTRACT

The City of Shelby, through a 2006 Water Preliminary Engineering Report (PER), and November 2007 project plans and specifications, both prepared by Thomas, Dean and Hoskins, Inc. (TD&H), has investigated the needs of their public water system. The PER examined all components of the system including supply, storage, and distribution. The PER identified over $11,000,000 of distribution system improvements that are expected to be needed during the 20 year planning period. Improvements fall in three general categories.

- Improvements needed to provide minimum pressure and fire flows in the system.
- Extending or looping mains to serve additional population or new commercial or industrial areas.
- Replacements needed to reduce leakage and reduce potential for failures in aging mains.

For each need identified, at least one potential project was identified and a cost estimate developed.

City priorities are used to evaluate distribution projects and identify those that should be funded immediately. These goals include providing adequate fire flows in the middle pressure district residential area, a third connection across the east-west transportation corridor containing US Highway 2 and the BNSF “hi-line”, and replacing aging mains in the low pressure district. Four projects are proposed for Phase I as a result of this analysis: Re-establish 4th Avenue North Connector, Main Replacement Project 1, Main Replacement Project 2, Main Replacement Project 3, and a portion of Main Replacement Project 4. Cost of the preferred alternative is approximately $1.5 to $1.7 million. This Environmental Assessment (EA) will address only the initial Phase I project as proposed.

In order to protect water quality, the City also plans to install a 20 foot radius bentonite protective apron around two of the existing wells as part of the Phase I work. The bentonite will be sealed to the casing or the foundation wall of the well house to prevent

surface water from short circuiting directly into the well from the ground surface during flooding events.

The project will be funded by a combination of state grants and loans and local funds. This Environmental Assessment (EA) examines the Phase I work as described in the Water PER and project plans and specifications. Based on this review, environmentally sensitive characteristics such as wetlands, floodplains and threatened or endangered species are not expected to be adversely impacted as a consequence of the proposed Phase I project. No significant long-term environmental impacts were identified.

Under Montana law (75-6-112, MCA), no person, including a municipality or county, may construct, extend, or use a public water system until the DEQ has reviewed and approved the plans and specifications for the project.

D. COMMENT PERIOD

Thirty (30) calendar days.

II. PURPOSE AND NEED FOR ACTION

Distribution

The City of Shelby water system was established over 65 years ago with original wells being drilled in 1940. Many of the original 1947 water mains lines are still in operation within the city, but quickly deteriorating, causing leakage and major breaks. These aging, undersized lines create a concern for fire flows and service pressure to the residents and businesses of Shelby. At the same time, a wellhead protection system is needed to further insure the safety of the Shelby water system. Based on the analysis seen in the PER the Shelby water system has the following deficiencies:

- Aging distribution lines causing leaks and major breaks.
- Undersized dead-end distribution lines.
- A well field on the floodplain of the Marias River and shallow wells susceptible to contamination.

Shelby has several areas with long dead end mains. Water quality is improved by eliminating dead ends where water becomes stagnant. Looping improves reliability and flexibility by providing alternate paths for water to reach each point if one line is out of service. Looping improves fire flow capability, while utilizing smaller mains.

The existing system was analyzed to determine its performance capability in various areas of town. The distribution system performance characteristics were simulated utilizing the computer model WaterCad with calibration data from actual hydrant tests. This modeling of the city system shows inadequate fire flows in many areas of the city.

The part of town north of the BNSF tracks and US 2 contains about half of the service area, yet is fed by only one 6 inch and one 8 inch crossing. Repairing either of these lines in the event of a failure would be time consuming and costly due to the transportation corridor, inevitably resulting in reduced service to the north service area for an extended period. In order to provide redundancy to this part of town another crossing is recommended.

A proper water distribution system is important for public health and safety. Instigating the changes recommended by the Water PER will reduce the public health and safety risk to the residents and visitors of Shelby, Montana.

Wellhead Protection

The purpose of the wellhead protection improvements is to reduce the likelihood that surface water can flow directly into wells during times of surface flooding from the Marias River. During spring floods the wells have the potential to become inundated by river water. Wells 7 and 8 are of particular concern given that ice jams have a tendency to collect just south of the main park area where there is a bend in the river. These ice jams raise water levels in the vicinity of wells 7 and 8 on a more frequent basis than flooding occurs at the rest of the wells.

III. ALTERNATIVES INCLUDING THE PROPOSED ACTION AND COSTS

Alternatives analyzed in the 2006 Water PER include the "do nothing" option or replacing the old, undersized lines with properly sized PVC water mains and adding sections of water main to improve system looping.

The "Do Nothing" alternative was not considered beyond the initial screening stage. This alternative will not remedy the serious problems currently being experienced with the distribution system. If improvements are not made to the distribution system, the community will continue to be unable to provide minimal fire flow for the residents of Shelby and portions of the system will continue to have frequent leaks and breaks. Likewise, the "Do Nothing" alternative for the source water protection portion of the project would leave the possibility of flood water tracing the well casings and entering the water supply, which the City has determined is an unacceptable situation.

The City of Shelby has modified the 2006 PER proposed Phase I improvements to better match the current needs and funding. Based on this 2007 analysis the Phase I improvements include the following items:

Wellhead Protection – 2 Wells

Alternatives for sealing the area around wells number 7 and 8 included the use of asphalt, PVC, HDPE and bentonite. Bentonite was selected based on its effectiveness, cost and environmental characteristics. The proposed wellhead seal will consist of 12-inches of bentonite/soil mixture under a 6-inch surface layer topsoil. This seal will extend in a 20-foot radius around well number 7 and 8. The estimated construction cost for this work is between $156,000 and $179,400

Re-establish 4th Avenue North Connector

This project includes the re-establishment of the old crossing under the railroad at 4th Ave. North and includes the following of water mains:

- 4th Ave. North from Main St. East to W Central Ave.
- West Central Ave. from Fergus St. to Silver Bow St.
- Silver Bow St. from W Central Ave. to Oilfield Ave.
- W Dawson Ave. from Fergus St to Mineral St.
- Oilfield Ave. from Silver Bow St. to Blaine St.
- Blaine St. from Oilfield Ave. to the alley between Hill Ave. and Granite Ave.

This project replaces the old 6 inch diameter pipe in 4th Ave. South with a new 12 inch diameter main from E Main St. to Oilfield Ave. and replaces the tie-in mains with 8 inch diameter mains. This project will provide better fire flows to the area and provide an additional crossing of the railroad for better system redundancy.

Main Replacement Project 1

This project includes the following lines:

- 2nd St. South from 5th Ave. South to 1st Ave. South
- 1st Ave. South from 2nd St. South to1st St. South

- 1st St. South from 1st Ave. south to Montana Ave.
- Montana Ave. from 1st St. South to Main St. East
- Main St. East from Montana Ave. to1st Avenue Southeast

All of these main replacements are replacing 6 inch diameter or smaller mains with 8 inch diameter mains in order to reduce leaks and provide adequate fire flows in the system.

Main Replacement Project 2

This project includes the following lines:

- 1st St. North from the alley north of 10th Ave North to the alley north of 11th Ave North
- Main Street from 6th Ave North to 7th Ave North
- 3rd St South from 5th Ave South to 7th Ave 7th Ave South
- 5th Ave South from 2nd St South to 3rd St South
- Ohaire Blvd from 5th Ave South to 6th Ave South

All of these main replacements are replacing smaller and / or older mains with 8-inch diameter mains in order to reduce leaks and provide adequate fire flows in the system.

Main Replacement Project 3

This project consists of replacing the following mains in the core area of town:

- 5th Ave. South between 1st St. South and 2nd St. South
- 1st St. South between 6th Ave. South and 5th Ave. South
- 2nd St. South between 6th Ave. South and 5th Ave. South

This project provides replacement of smaller and / or older mains to 8 inch mains for better system fire flows and to reduce leaks.

Main Replacement Project 4

This project includes the following lines:

- 8th Ave North from 1st St South to 2nd St South
- 9th Ave North from 1st St South to 2nd St South
- 10th Ave North from 1st St South to 2nd St South
- 11th Ave North from 1st St South to 2nd St South
- 12th Ave North from 1st St South to 2nd St South
- 1st St South from 11th Ave South to 12th Ave South
- 2nd St South from 11th Ave South to 12th Ave South

All of these main replacements are smaller and / or older mains with 8-inch diameter mains in order to reduce leaks and provide adequate fire flows in the system.

The combined cost of the 4th Ave North Connector and Projects 1 through 4 have an estimated construction cost of $1,588,000 to $1,826,000.

The water main improvements are anticipated to be constructed within existing rights of way or in easements provided to the City. Permits will be required from the BNSF railroad for work through the right of way and under the existing tracks. One of the options will also probably require the need for occupancy permits with the Montana Department of Transportation.

For Phase I of the work, the City of Shelby has received funding commitments of:

$750,000	grant – Montana Department of Commerce/Treasure State Endowment Program (TSEP)
$100,000	grant – Montana Department of Natural Resources and Conservation/Renewable Resource Grant and Loan Program (RRGL)
$650,000	loan – Montana Department of Environmental Quality, State Revolving Fund Loan Program (SRF)
$1,500,000	**Total Phase I Funding**

Total Funding for the proposed Phase I Project - $1,500,000 (the City can adjust the amount borrowed from the SRF Program once bids have been received). The project will be bid in several schedules to allow the City of Shelby to complete as much of the proposed Phase I work as they can within the existing Phase I budget.

USER RATES

Sewer rates currently average approximately $17.60 per month per user or $15.30 per month per EDU based on 1,564 sewer EDU's. Existing combined water and sewer rates per EDU are approximately $53. The cost of the proposed construction will not increase the current monthly rates.

IV. AFFECTED ENVIRONMENT

A. STUDY AREA

The City of Shelby is located in the southwest corner of Toole County in north-central Montana, at the intersection of Interstate 15 North and U.S. Highway 2 (Fig. 1). Shelby is the county seat. The Burlington Northern Santa Fe Railroad's "Hi-Line" route runs through Shelby in essentially a parallel route with Highway 2. Shelby lies within Sections 21;22;27;28;35, Township 32 North, Range 2 West, Montana Principal Meridian.

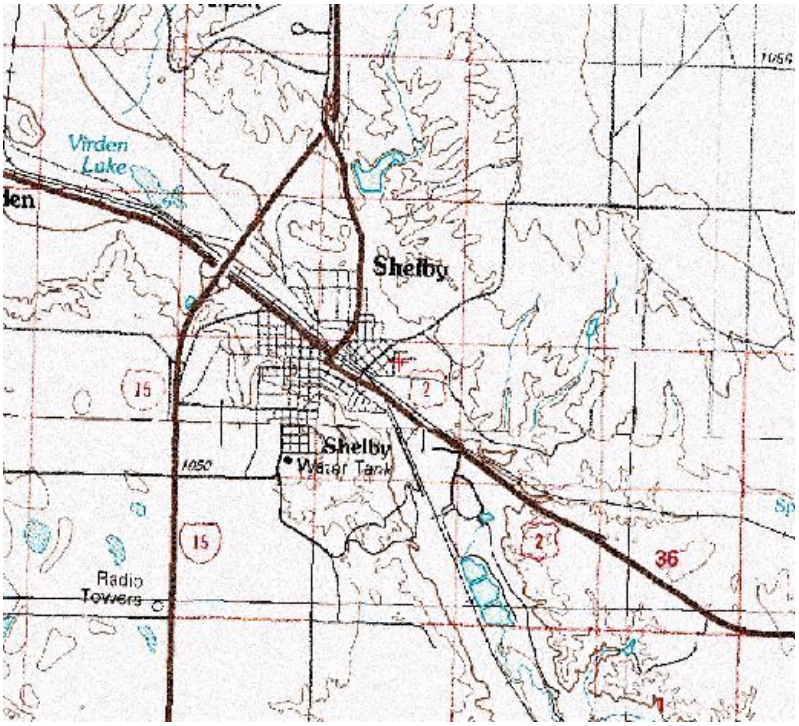

Figure 1

B. POPULATION AND FLOW PROJECTIONS

The Shelby service area has an average daily per-capita water consumption of 156 gallons (data from 1994 to 2005). The population is projected to grow by one percent per year through the year 2025. This results in a projected population of approximately 4,195 residents.

A 500-bed correctional facility (Crossroads) has been constructed in the City of Shelby. In the future, it could be expanded to house a maximum of 1500 prisoners. For the purposes

of this report it will be assumed that only an additional 500 beds will be added during this planning period. Based on existing records the prison has a domestic water demand of 98 gpd per bed as shown by the meter records.

Other large users of the system include the Ethridge Water Users Association, which is a water district outside of town. Water is supplied to the citizens in the area through a single metered connection.

The 2006 Water System PER includes the analysis of current and projected water demands and examines the source capacity of the existing water system. The average day is based on existing data, the maximum day is based on a calculated max day to average day ratio of 3.11 to 1. Max hourly demand is estimated based on applying a 5.5 factor to the average day. The results of the flow projections can be seen in Table 1.

TABLE 1
CITY OF SHELBY, MONTANA
CURRENT AND FUTURE WATER DEMANDS

Demand(gpcd)		2005[1] Demand (gpd)	2005[1] Demand (gpm)	2025[2] Demand (gpd)	2025[2] Demand (gpm)
Avg. Daily	156	623,750	433	805,480	559
Max. Daily	-	1,940,000	1,347	2,505,043	1,740
Max. Hourly	-	-	2,382	-	3,076

[1] Based on Current Water Use and population of 3,992 (City at 3,438, Crossroads at 525 and Ethridge at 29)
[2] Based on population of 5,295 (City at 4,195, Crossroads at 1,050 and Ethridge at 50)

Based on current Montana Department of Environmental Quality (DEQ) standards, the groundwater source capacity must equal or exceed the design maximum day with the largest producing well out of service. The total existing supply capacity of 1,750 gpm meets the design flow but requires the use of all 13 wells. Future expansion of the water supply system or a reduction of the demand through conservation or leak reduction will be required to provide adequate 2025 design flows.

C. NATURAL FEATURES

Topography. Shelby lies in a large broad coulee that joins the Marias River about 7 miles south and east of Shelby. This coulee extends for several miles northwesterly from Shelby toward the Canadian border and contains a series of natural depressions. These depressions form lakes that intermittently store water. The coulee south of Shelby has a defined channel that frequently flows water. The coulee west of Shelby is fairly broad and flat and typically does not have a well defined channel. The coulee bottom in Shelby is about one half mile wide. The sides of the coulee rise sharply to relatively flat plateaus or benches on both the north and south sides of town. The benches are about 160 feet or more above the coulee floor. Ground slopes on the sides average about 10 percent but exceed 20 percent in some areas. A series of finger coulees extend out from the main coulee. Some are significant in size and have caused flooding problems in the City in the past. Lake Shel-oole was constructed in one of these coulee systems on the north side of town as part of a flood control project.

Soils. Soils in the area are glacial deposits with rounded boulders of varying sizes interspersed in a clay, silty, sandy soil. These soils overlie soft sedimentary rock formations from the Cretaceous era. These formations consist of siltstones, sandstones, and shale. These rock formations are relatively shallow along the bottom of the coulee. The surface soils are very aggressive toward metallic pipe, particularly in areas where groundwater is present.

Groundwater and surface water. A groundwater system is present above the underlying rock formations. The water table is very close to the ground surface west of town and varies seasonally. In general, the groundwater table is only shallow along the coulee bottom and well below the surface of the plateaus to the north and south of the coulee. Water quality is poor and wells are not very productive because of the fine grained soils.

The City of Shelby has had to drill water supply wells along the Marias River five miles south of Shelby in order to find water of satisfactory quality and quantity to meet the City's needs. These Marias River wells are typically shallow - 35 to 50 feet in depth. Gravels and sands overlie a shale formation typically found at 35 to 40 feet in this area.

Floodplains. Portions of the City have been subject to flooding in the past due to local runoff from the adjacent coulees. The Lake Shel-oole flood control project has eliminated the majority of the local flooding. Shelby is not within a major floodway. Although the main coulee is quite long, the upstream natural depressions and lakes appear to control floods on the main drainage system. The City's water supply well field is located adjacent to the Marias River and is flooded periodically. The water treatment facility is well above and out of the flood plain.

Land Use. The area around Shelby is mainly agricultural. The 1, 200,000 acres of rolling prairies surrounding Shelby are used for livestock grazing and for growing wheat, barley and mustard. Approximately 10,000 acres are irrigated.

Biological Resources
Fauna of the general area consists of typical mammalian species found in the intermountain west, including mule deer, whitetail deer, coyote, rabbit, skunk, rodents and others. Common bird species include the black-billed magpie, American robin, Canadian goose, osprey, blackbird, sparrow, warbler, common waterfowl, other raptors, game birds and others.

Vegetation
Vegetation types in immediate proximity to Shelby generally include agricultural, and range lands with some riparian zones located along the Marias River.

V. DIRECT AND INDIRECT ENVIRONMENTAL IMPACTS OF PROPOSED PROJECT

No adverse impacts to the environment are anticipated by implementation of the proposed water system improvements. All of the distribution system improvements will be located within the existing limits of the City, either in existing streets or in platted street right-of-ways.

Soils Suitability, topographic and Geologic Constraints
No soil, topography or geological constraints are present for the proposed Phase I water project. Based on the existing conditions and soils types, the indirect impacts of the proposed Phase I water project will have no significant effect on the soils or topography.

Biological Resources

The construction of the recommended improvements is not expected to impact endangered or threatened species. The work will be accomplished on City owned property, public rights-of-way or negotiated easements. Only minor construction related impacts are anticipated.

Water Resource Issues

Surface water in the project area consists of the Marias River. Groundwater is in a fairly shallow basin in the river valley. In Shelby, the groundwater is variable with the elevation. There are concerns with shallow groundwater impacting the existing and future distribution system, especially in the lower areas of town. Projects recommended in this report are not expected to impact surface waters or ground water.

Floodplains and Wetlands

The City of Shelby is not within a floodplain. The location of the well field is probably within the 100-year floodplain of the Marias River, although the floodplain has not been officially delineated. The existing well heads and small pump houses are the only encroachments into the floodplain; any new pipelines in this area will be buried. There is no significant impact expected to the existing floodplain for any parts of this project.

There are currently no officially delineated wetlands within the planning area.

Cultural Resources & Historical Sites

The State Historic Preservation Office indicated that there is a low likelihood that cultural properties in the area will be impacted by the type of work contemplated in this report, and a cultural resource inventory is therefore unwarranted.

Socio-Economic Issues

The population served by this water system is not considered to be disadvantaged either by minority or income status. The human health and environmental effects are not expected to be disproportionate to the benefits received by the project.

Air Quality - Short-term negative impacts on the air quality will occur from heavy equipment, dust and exhaust fumes during project construction. Proper construction practices and dust abatement measures will be implemented during construction to control dust, thus minimizing this problem.

Energy - During construction of the proposed project, additional energy will be consumed, resulting in a direct short-term increased demand on this resource.

Noise - Short-term impacts from increased noise levels will occur during construction of the proposed project improvements. Construction activities are anticipated to last three to five months and will occur only during daylight hours.

A. UNAVOIDABLE ADVERSE IMPACTS

All of the water lines will be constructed within the street right-of-way; therefore street surface restoration will be required. Also, access to and from homes and businesses during construction will take special consideration. Short-term construction related impacts, such as noise, dust and traffic disruption, will occur but should be minimized through proper construction management. Energy consumption during construction cannot be avoided.

B. CUMMULATIVE IMPACTS

This project addresses the existing water utility needs and will have no subsequent negative cumulative effects on resources, ecosystems or human communities. This project is part of a

phased improvements plan that includes providing City water service to new and developing areas within and surrounding the city of Shelby. Future growth would increase traffic thus increasing air pollution and noise. The potential for soil erosion and runoff from paved areas could potentially impact surface water quality in the area. The projected growth of Shelby over the next 20 years is not expected to cause cumulative effects beyond the capacity of the resources. Future MEPA analysis would be required for any discussion of cumulative impacts beyond this scope and time frame.

VI. PUBLIC PARTICIPATION

In order to garner public input into this project and the preliminary engineering report, a public hearing was held before the Shelby City Council on April 17, 2006 at the City Hall. A presentation was made on the PER and its findings and recommendations. There were no specific comments on the report by the public. An earlier public hearing was held March 6, 2006. City personnel also made presentations at meetings of the following organizations: Shelby Merchant Association (March 15, 2006), Shelby Kiwanis (March 8, 2006), Shelby Area Chamber of Commerce (March 27, 2006), and Shelby Soroptimists (April 5, 2006).

VII. AGENCY ACTION, APPLICABLE REGULATIONS, AND PERMITTING AUTHORITIES

All water system improvements (distribution and source water protection) will be designed to meet Montana DEQ requirements. Proper State regulatory review and approval of the project plans and specifications will be provided. All applicable local, federal and state permits will be required including, but not limited to, a stormwater discharge permit and a construction-dewatering permit if needed.

All appropriate easements and access will be addressed with regards to the water system infrastructure. If required, land acquisition or long term agreements will be established for the land requirements associated with a new well and transmission main.

VIII. REFERENCE DOCUMENTS

The following documents were utilized in the environmental review of this project and are considered to be part of the project file:

A. The City of Shelby, Montana – Water Preliminary Engineering Report, April 2006, prepared by TD&H Engineering, Great Falls, Montana.
B. The City of Shelby, Montana – Water System Improvements Plans and Specifications, November 2007, Prepared by TD&H Engineering, Great Falls, Montana.
C. Uniform Environmental Checklist for Montana Public Facility Projects, April 2006, prepared by TD&H Engineering, Great Falls, Montana.

IX. AGENCIES CONSULTED

The following agencies were contacted regarding the proposed construction of this project:

A. The U.S. Fish and Wildlife Service was asked in a letter by the project consultant for comments on the proposed project. The Service reviewed the proposed project and determined “no effects to federally protected species will occur.”

B. The U.S. Army Corps of Engineers was asked in a letter by the project consultant for comments on the proposed project. The U.S. Army Corps of Engineers stated that a section 404 permit would be need if the project included any work in wetlands or waters of the U.S. The proposed Shelby water system improvements project will not include work in these areas.

C. The Montana Historical Society's Historic Preservation Office reviewed the project and a comment letter was received April 17, 2006. The letter states, "We feel that there is a low likelihood cultural properties will be impacted. We, therefore, feel that a recommendation for a cultural resource inventory is unwarranted at this time. However, should cultural materials be inadvertently discovered during this project we would ask that our office be contacted and the site investigated."

D. The Montana Department of Natural Resource and Conservation Service was asked in a letter by the project consultant for comments on the proposed project. The agency stated there where no floodplain maps for the Shelby area and the project would therefore be in compliance with the Floodplain Management Protection Act of 1973. The response letter also states that the construction of buildings near the Shelby well site should be avoided, if possible. The proposed project does not include the construction of any building at the well field.

E. The Montana Department of Environmental Quality – Water Protection Bureau reviewed the proposed project and stated they did not have enough information to determine what permits would be necessary for the project but provided a list of potential permits and information on how to obtain permits if needed. All necessary permits will be obtained prior to construction.

X. RECOMMENDATION FOR FURTURE ENVIRONMENTAL ANALYSIS

[ ] EIS [ ] More Detailed EA [X] No Further Analysis

Rationale for Recommendation: Through this EA, The Montana DEQ has verified that none of the adverse impacts of the City of Shelby's Water System Improvements Project are significant. Therefore, an environmental impact statement is not required. The environmental review was conducted in accordance with the Administrative Rules of Montana (ARM) 17.4.607 thru 17.4.610.

EA Prepared By:

Robert Ashton Date

EA Reviewed By:

Marc Golz, P.E. Date